

JUDGE MCKENNA

07 CV

6338

UNITED STATES DISTRICT COURT
THE SOUTHERN DISTRICT OF NEW YORK

-----X
MERCEDES PRIETO,

NOTICE OF REMOVAL

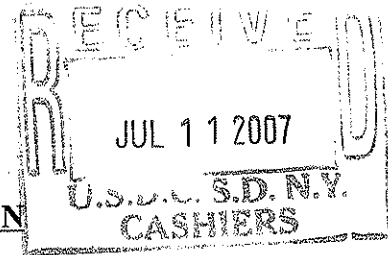
Plaintiffs,

Civ.

-against-

TARGET CORPORATION and TARGET STORES,

Defendant.
-----X



REMOVAL PETITION

To the Honorable Judges of the United States District Court for the Southern District of New York, the defendant, **TARGET CORPORATION and TARGET STORES**, by their attorneys, Connors and Connors, P.C., state the following upon information and belief:

1. That the defendant, Target Corporation and Target Stores hereinafter referred to as Target, is a defendant in the above-entitled action.
2. That Target was incorporated in the State of Minnesota and has its principal place of business in Minneapolis, Minnesota.
3. That on June 13, 2007, CT Corporation as agent for Target received a copy of the summons and complaint filed on behalf of plaintiff in the Supreme Court of Bronx County.
4. That the action presenting pending in the Supreme Court of the State of New York for the County of Bronx is as follows:

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF BRONX

-----X
MERCEDES PRIETO,

Index No.: 15989/07

Plaintiffs,

-against-

TARGET CORPORATION and TARGET STORES,

Defendant.
-----X

5. That defendant, Target is filing this Notice of Removal within 30 days of receipt of the summons and complaint by Target's corporate offices.

6. That on June 13, 2007, the law firm of Connors & Connors, P.C. was retained to defend Target Corporation in this matter.

7. Upon information and belief, the plaintiff Mercedes Prieto, is a citizen of New York State, County of Bronx.

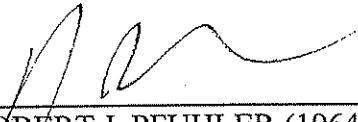
8. The amount in controversy in this action exceeds the sum of \$75,000 exclusive of interests and costs.

9. This is an action for damages for personal injury resulting from the alleged negligence of the defendant.

10. This Honorable Court has original jurisdiction over this action pursuant to 28 U.S.C. §1332 and the action may therefore be removed to this Honorable Court pursuant to 28 U.S.C. §1441.

11. A copy of the Summons and Complaint received by Target is annexed hereto.

WHEREFORE, Target prays that the above-entitled action now pending against them in the Supreme Court of the State of New York, County of Bronx, be removed to this Honorable Court.



ROBERT J. PFUHLER (1964)
CONNORS & CONNORS, P.C.
Attorneys for Defendant,
TARGET CORPORATION and TARGET STORES
766 Castleton Avenue
Staten Island, New York 10310
(718) 442-1700
File No. DTS 23516

TO: BABAJA & GUARNERI
Attorneys for Plaintiff
35 East Grassy Sprain Road
Suite 204
Yonkers, New York 10710
(914) 961-1359

UNITED STATES DISTRICT COURT
THE SOUTHERN DISTRICT OF NEW YORK

-----X
MERCEDES PRIETO,

NOTICE OF FILING

Plaintiffs,

-against-

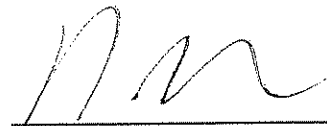
TARGET CORPORATION and TARGET STORES,

Defendant.
-----X

SIRS:

PLEASE TAKE NOTICE, that upon the removal of this action from the Supreme Court of the State of New York, County of Bronx, to the United States District Court for the Southern District of New York, a Notice of Removal, a copy of which is annexed hereto was duly filed in the Office of the Clerk of the United States District Court for the Southern District of New York on the 11th day of July, 2007.

Dated: Staten Island, New York
July 11, 2007



ROBERT J. PFUHLER (1964)
CONNORS & CONNORS, P.C.
Attorneys for Defendant,
TARGET CORPORATION and TARGET STORES
766 Castleton Avenue
Staten Island, New York 10310
(718) 442-1700
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TO: BABAJA & GUARNERI
Attorneys for Plaintiff
35 East Grassy Sprain Road
Suite 204
Yonkers, New York 10710
(914) 961-1359

CERTIFICATE OF SERVICE

I, ROBERT J. PFUHLER, hereby certify that a copy of the foregoing NOTICE OF REMOVAL was mailed by first class mail, postage prepaid, this 11th day of July, 2007, to all counsel of record as indicated below.



ROBERT J. PFUHLER (1964)

TO: BABAJA & GUARNERI
Attorneys for Plaintiff
35 East Grassy Sprain Road
Suite 204
Yonkers, New York 10710
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